

EXHIBIT 10

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

GAYLE NIX JACKSON

Plaintiff,

v.

UNITED STATES OF AMERICA, et al.

Defendants.

Civil No. 15-cv-02035-RCL

DECLARATION OF GAYLE NIX JACKSON.

I, GAYLE NIX JACKSON, declare under penalty of perjury that

1. I am over the age of 18 and a resident of the State of Texas.
2. I am personally aware of the facts and circumstances regarding the subject matter of the complaint, namely the original Nix film ("film"), and with the facts of the case. I have also read the Motion to Dismiss filed by the Defendants and submit this Declaration in response.
3. The Nix film was recording of the assassination of John F. Kennedy at Dealey Plaza in Dallas, Texas on November 22, 1963 taken by Orville Nix. Orville Nix is my grandfather and passed away in 1972. I was very close to my grandfather and read all letters and documents to him as he was illiterate and never finished grammar school. We would always be together and I was always involved with anything work related or concerning the film. The film was significant as it created a unique bond between us with special meaning that continues to this day with even more meaning to find it.
4. The original Nix film is what is referred to as the camera original that has significant

historical and economic value and is in high demand by the public. I am the owner of the film having acquired the rights as an heir and the remaining heirs have assigned what rights to the film they had to me.

5. I had made several inquiries to the National Archives Records Administration with the most recent response from the NARA in 2015 indicating there were no records of the original Nix film being in their custody or control at anytime.

6. I have spent hundreds of hours over the years trying to find out what happened to the film and when it went missing but I have never received any reasonable answers.

7. In late 2014, I had several phone conversations with G. Robert Blakey, then chief counsel to the House Select Committee on Assassinations, (HSCA) in 1978, and informed me for the first time that he and the members of the HSCA had seen, possessed and inspected the original Nix film as part of the investigation into the JFK assassination authorized by the US Congress. Mr. Blakey represented that the film also had an index, which is the film's chain of custody, that would indicate who possessed it and when including who had it last. Mr. Blakey stated that the NARA would have received the film and the index from the HSCA when it disbanded to preserve it. He also stated that he takes full responsibility for the film.

8. Prior to my conversations with Mr. Blakey in 2014, all my efforts to obtain information about the film from the US Government and its agencies, including the NARA were answered in an unreasonable manner including speculation and hearsay but have never provided it or the index to show who possessed it and when.

9. It was not until being informed by Mr. Blakey in 2014, that I knew that the film was inspected, seen and in the possession of the HSCA in 1978 which information was never made public.

10. The NARA is authorized and set to release all remaining records of the JFK assassination that have been withheld pursuant to the JFK Act that requires the US Government and its Agencies to search and produce all records related to the JFK assassination that should include the original Nix film in October 2017. It is at that time, that I hope and believe the film will be returned or that information of its whereabouts provided so that it can be retrieved or its permanent loss determined.

By signing below, I declare under penalty of perjury under the laws of the United States that the foregoing statements contained herein are true and accurate based upon my personal knowledge



Gayle Nix Jackson